



E-learning webinar:

Event Code: EWEB23032001

Foreign-sourced income exemption regime webinar series Intellectual property income

About the topic

The Taxation Faculty is organizing a series of e-seminars to provide members with a better understanding of the new foreign-sourced income exemption (FSIE) regime in Hong Kong. In addition to giving an overview of the FSIE regime, specific issues under the FSIE regime will also be covered.

Further to the webinar delivered by Mr Benjamin Chan, Deputy Commissioner (Technical) of the Inland Revenue Department (IRD), on Hong Kong's proposed new FSIE regime in mid-December, the Inland Revenue (Amendment) (Taxation on Specified Foreign-sourced Income) Ordinance 2022 was gazetted on 23 December 2022 and came into effect on 1 January 2023.

To address the European Union's concerns about the risks of double non-taxation under Hong Kong's offshore regime for passive income, the ordinance sets out a new framework for Hong Kong's FSIE regime. Under the ordinance, foreign-sourced interest, dividends, disposal gains from the sale of equity interests and intellectual property (IP) income may be deemed to be sourced from Hong Kong and chargeable to profits tax, unless certain requirements are met, such as having sufficient economic substance, or, in the case of IP income, fulfilling a "nexus" requirement in Hong Kong. The ordinance also provides relief against double taxation in respect of relevant income.

In this seminar, the speakers will

- Discuss the FSIE regime's impact on IP income in Hong Kong
- Discuss the IP rights and research and development deduction regimes in Hong Kong
- Discuss practical issues facing IP arrangements going forward

Click [here](#) for more events by Taxation Faculty

About the event

Date & time	Monday, 20 March 2023 1:00 p.m. – 2:30 p.m.
Format	Live webinar
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$170• HKICPA member or student; and IA: HK\$200• Non-member: HK\$330 <i>Not a faculty member? Click here to join.</i>
Language	English
HKICPA CPD credit	1.5 hours (subject to actual attendance)
Rating	Intermediate level*
Competency	Taxation*
Application deadline	Online registration by 16 March 2023 (offline registration by 14 March 2023)

Speakers

Ricky Chow

Member, Taxation Faculty Budget
Proposals Task Force, and
Partner, Tax Services,
PwC Hong Kong

Candice Mak

Senior Manager, Tax Services,
PwC Hong Kong

* Please refer [here](#) for descriptions of the various ratings.



About the speakers

Ricky Chow

Partner, Tax Services, PwC Hong Kong

Ricky is a tax partner of PwC Hong Kong. Over the last 18 years, Ricky has been focusing on providing various kinds of Hong Kong and international tax consultation advice, as well as being involved in tax planning and tax structuring work for companies with cross-border transactions. He serves a wide range of clients, including multi-national corporations and PRC enterprises, and possesses extensive experience in resolving tax disputes with the Hong Kong Inland Revenue Department. He is also a frequent tax seminar speaker and contributor of articles in tax journals.

Ricky holds his Bachelor of Business Administration degree in Professional Accountancy from the Chinese University of Hong Kong. Besides, he is a member of the Hong Kong Institute of Certified Public Accountants and the Taxation Institute of Hong Kong.

Candice Mak

Senior Manager, Tax Services, PwC Hong Kong

Candice is a senior manager of PwC Hong Kong, who has nearly 10 years of experience in both the professional and public sectors. During her time at PwC, Candice has extensive experience in providing tax compliance and business consulting services, including offshore claims, applications for tax treaty benefits, and tax planning work for cross-border transactions and group restructuring. Candice also has a 4-year experience working in the IRD and hence acquired in-depth and all-rounded knowledge about the IRD's practices and procedures. Such invaluable insight facilitates her negotiation and resolution of clients' tax disputes with the IRD from various angles.

Disclaimer

- The opinions expressed by external guest speakers are, by their nature, those of the speakers. They are not necessarily endorsed by the Institute or reflect the official policies and views of the Institute or its members.
- The Institute does not endorse or recommend any products or services and is not responsible to any loss or damage arising from using such products or services.
- Participants are reminded that there are a wide range of products or services available in the market. Participants should carry out their own research and obtain independent advice before subscribing to any products or services.
- The Institute takes no responsibility for any loss incurred by any person acting or refraining from acting as a result of participation in the event.

Registration

- **Online enrolment by 16 March; offline enrolment by post or email also by 14 March:**

Complete the enrolment form and return it to the Institute by 14 March, together with full payment. Cheque should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". E-mail registration will be accepted for payment by any VISA/ Master card or the BOC HKICPA UnionPay card.

You may consider your registration to be successful unless you receive notification from us to the contrary.

- Upon successful enrolment, the meeting URL and login password will be provided nearer the event date.
- **Contact Mr. Marco Yip at 2287-7009 or Ms. Denise Kwok at 2287-7253 for enquiry.**